Postal Rate Commission Submitted 11/20/2002 3:38 pm Filing ID: 35996

BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

EXPERIMENTAL RATE AND SERVICE CHANGES TO IMPLEMENT NEGOTIATED SERVICE AGREEMENT WITH CAPITAL ONE SERVICES, INC.

Docket No. MC2002-2

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS WILSON TO INTERROGATORIES OF OFFICE OF THE CONSUMER ADVOCATE (OCA/USPS-T4-13,16, 17(a), (b)(vii – x), (c)(vii – x), (d), (e)(vii – x) and (f)(vii – x), 18, 20, 21)

The United States Postal Service hereby moves that the responses of witness Wilson to the interrogatories of the Office of the Consumer Advocate: OCA/USPS-T4-13, 16, 18, 17(a), (b)(vii – x), (c)(vii – x), (d), (e)(vii – x) and (f)(vii – x) 20, 21, filed on November 5, 2002, be accepted three business days late. The delay was caused by Mr. Wilson's heavy travel schedule, which impeded the timely preparation of the answers. The undersigned counsel does not believe that any party will be prejudiced by this short delay.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-3089 Fax -5402 November 20, 2002

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all
participants of record in this proceeding in accordance with section 12 of the Rules of
Practice

Nan K. McKenzie

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260–1137 November 20, 2002